



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270

September 8, 2022

Sent by email only

Gulf Coast Sequestration  
2417 Shell Beach Drive,  
Lake Charles, LA 70601

**RE: Underground Injection Control (UIC) Permit Application R06 - LA0016GCS**  
**Class VI Pre-Construction Permit Application**  
**Administrative Review of Application**

Dear Mr. Heard:

EPA has reviewed the material submitted as of August 31, 2022. Our review team assigned to your Class VI application could not locate some items required to deem your application administratively complete. These items are critical components of the application's technical review phase to issue a permit to construct. We wanted to be sure that if the items were not included in the application package, then Gulf Coast Sequestration is working on submitting the required data (see below).

**Folder 01. Project Info**

Section 2.0 Project Background

- Missing a list of the activities conducted by the applicant which require RCRA, UIC, NPDES, or PSD permits.
- Missing SIC codes.

Section 5.0 Site Suitability

- Missing Table A.2 - H2O Wells AoR 5-Mile Buff and subfolder Loc Data, referenced on page 87 of 120.

Section 8.0 Description of Well Construction Plan

- Missing discussion of internal and external pressures related to casing and cement within the injection well construction plan [40 CFR 146.86(b)(1)(ii)].
- Missing discussion of continuous recording devices and automatic shutoff devices to monitor: injection pressure; the rate, volume and/or mass, and temperature of the CO2 stream; and the pressure on the annulus between the tubing and the long string casing and annulus fluid volume [40 CFR 146.88(e)].
- Table 8.3.9-3 is mislabeled in the table list or on the table itself. It is on the table list as Table 8.3.9-2. It is labeled on the table itself as 8.3.9-3. There is no labeled table 8.3.9-2.
- Schematic is a (far too) generic injection well [40 CFR 146.88(e)].

**Folder 04. Pre-Op Testing**

Section 3.0 Pre-Injection Testing Plan

- Missing a plan to measure rock strength in the confining zone, addressing tensile strength, compressive strength, shear strength, and impact strength [40 CFR 146.82(a)(3)(iv)].

**Folder 05. Proj Plan Submissions**

- Missing a proposed schedule for submitting post-injection site care monitoring results [40 CFR 146.93(a)(2)(iv)].

Once this data is submitted into the GSDT and CBI-protected OneDrive, our team will be able to resume reviewing your application.

If you have any questions, please contact Sona Chaudhary at [chaudhary.sona@epa.gov](mailto:chaudhary.sona@epa.gov).

Sincerely,

Ken Johnson, PE  
Ground Water / UIC Section Chief